

Remarks

The present response is filed with a Request for Continued Examination (RCE), and is responsive to the Office Action mailed in the above-referenced case on November 22, 2002, made Final. Claims 1, 3-7, 9-13, 15 and 18 are standing for examination. The Examiner has rejected claims 1, 3-7, 9-13, 15 and 18 as being unpatentable over Iwami (U.S. 5,604,737), hereinafter Iwami, in view of Guck (5,911,776), hereinafter Guck. The Examiner states that, regarding independent claims 1, 7, 13 and 18, Iwami substantially discloses the limitations of applicant's claims, but does not specifically disclose that the LAN network includes the Internet. The Examiner relies on Guck to teach that the network could be either Intranet or Internet, stating that Iwami discloses that the communication terminal could be using TCP/IP or UDP/IP; voice communication may be adopted to support these protocols, and it therefore would have been obvious to combine the systems of Iwami and Guck.

Applicant has again carefully studied the prior art presented by the Examiner, and the Examiner's rejections and statements in the instant Office Action. In response, applicant herein amends the claims to more particularly point out and distinctly claim the subject matter regarded as patentable. Applicant points out and argues the key limitations in applicant's claims as amended which now clearly and unarguably distinguish over the prior art cited and applied by the Examiner.

In the last response filed by applicant on September 26, 2002, applicant argued that there is no suggestion to combine the references, and that obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either in the references themselves, or in the knowledge generally available to one of ordinary skill in the art. The Examiner responds in the present Office Action, acknowledging the above, adding that an ordinary person skilled in the art will know that the Internet and the LAN are interchangeable as taught by Guck. Applicant respectfully disagrees.

Applicant argues that the mere fact that the prior art can be modified as suggested by the Examiner does not make the modification obvious to the person of ordinary skill

in the art unless the prior art suggested the desirability of the modification. The prior art fails to suggest any motivation for, or desirability of, interchanging the LAN with the Internet, as urged by the Examiner. The teaching, suggestion or motivation for making the claimed invention obvious must actually be in the prior art presented, not based on the conclusion by the Examiner.

Further, the Examiner stated in the instant Office Action that, regarding claims 3-4 and 9-10, Iwami discloses a look-up table relating cost telephone numbers to IP addresses, and the terminal may have a telephone number so the communication may be established and connection to take place. The Examiner adds that moreover, it is inherent that specific data from the incoming call is coded in a portion of an IP address (i.e. control information is included such as the return number in order for the path to be established). Applicant must again respectfully traverse the Examiner's statement.

Applicant argues that it most certainly is not inherent that specific data is encoded in a portion of an IP address. Applicant wishes to direct the Examiner's attention to applicant's specification (beginning p. 18, line 13), with reference to Fig. 4, wherein it is clearly described that a COST telephone number may be encoded by an agent in the call center into an IP address of the computerized bridge, and the bridge has control routines which extract that COST number from the IP address or other header in an incoming IP call from the call center. The coded portion of the IP address may also have just a key instead of the entire cost number, and the key may allow look-up in a stored table at the bridge to ascertain the cost number to which the call may be connected and translated. Applicant believes that encoding and extracting such specific information from an incoming call, whether the call be a COST call or an IPNT call, for the purpose of using the extracted information to access a look-up table to determine a destination number or IP address for placing a second call related to the first incoming call, is a key and patentable distinction over the prior art.

Applicant herein amends the independent claims to include the limitations as outlined above, and embodied in claims 3 and 9. Claims 3 and 9 are accordingly herein cancelled.

Applicant's claim 1 as amended now recites:

1. (Amended) *A computerized telephony bridge unit, comprising:*

a trunk-line port and associated circuitry for receiving and placing Connection Oriented/Switched Telephony (COST) telephone calls on a COST network;

a data network port and associated circuitry for receiving and placing Internet Protocol Telephony Network (IPNT) calls on the Internet;

conversion circuitry for converting data representing calls dynamically between IPNT and COST telephone calls and

a digitally-stored look-up table relating COST telephone numbers to IP addresses;

characterized in that control routines functioning as part of the bridge unit receive a first incoming call from one of the COST and Internet networks, extract specific data encoded into the incoming call, either COST or IPNT, and use the extracted data to access the look-up table to determine an associated COST telephone number or IP address, and use the associated COST telephone number or IP address to place a call associated with the received call on the network other than the network on which the call is received, and dynamically convert data between the associated calls, and the dynamic conversion of data enables two people to engage in a live conversation even though one person is on the Internet and the other is on a COST network.

Applicant asserts that Iwami's teaching is limited to the local area network (LAN), and the combined art does not teach or suggest a system wherein two people engage in live conversation wherein one is on the COST or PSTN network, and the other is on the Internet or DNT network. Applicant disagrees with the Examiner's reasoning that because an IP protocol is used on the LAN of Iwami that it is suggested to be part of the Internet as the packets are formatted to be transported on the Internet. The packets formatted in Iwami are taught to be specifically for the LAN. Applicant argues that there is no teaching, suggestion, or motivation in the combined art to communicate the voice packets created in Iwami over the Internet as suggested by Guck.

Further, there is no capability, suggestion or motivation whatsoever in Guck for dynamically converting data formats of calls to and from COST or IPNT protocols, such

as would be required for conducting a live conversation over the Internet between two participants, where one participant is on a COST network, and the other participant is on an IPNT network. Guck teaches a completely different invention for solving a completely different problem than that of applicant's invention, and deals with completely different protocols for transmitting files over the Internet.

Still further, it certainly is not inherent that specific data is encoded into a first incoming call, regardless of protocol, and control routines of the computerized bridge extract the specific data and use the data to access a digital look-up table to ascertain a number or IP address for the purpose of placing a second call associated with the incoming call, as is now specifically claimed in applicant's independent claims as amended. Applicant argues that this is a key and patentable distinction over the prior art, either singly or combined.

Applicant believes, therefore, that the combined art clearly and unarguably fails to specifically teach, suggest or have motivation for all of the limitations of applicant's independent claims 1, 7, 9, 13 and 18 as amended. Claims 4-6, 10-12 and 15 are then patentable on their own merits, or at least as depended from a patentable claim.

As all of the claims have been shown to be patentable over the prior art, applicant respectfully requests that the rejections be withdrawn after Final, and that the case be passed quickly to issue.

If there are any extensions of time required beyond any extension specifically petitioned and paid with this response, such extensions are hereby requested. If there are any fees due beyond any fees paid by check with this response, authorization is given to deduct such fees from deposit account 50-0534.

Version With Markings to Show Changes Made

In the claims:

1. (Amended) A computerized telephony bridge unit, comprising:

a trunk-line port and associated circuitry for receiving and placing Connection Oriented/Switched Telephony (COST) telephone calls on a COST network;

a data network port and associated circuitry for receiving and placing Internet Protocol Telephony Network (IPNT) calls on the Internet; [and]

conversion circuitry for converting data representing calls dynamically between IPNT and COST telephone calls[;] and

a digitally-stored look-up table relating COST telephone numbers to IP addresses;

[wherein] characterized in that control routines functioning as part of the bridge unit receive a first incoming call from one of the COST and Internet networks, extract specific data encoded into the incoming call, either COST or IPNT, and use the extracted data to access the look-up table to determine an associated COST telephone number or IP address, and use the associated COST telephone number or IP address to place a call associated with the received call on the network other than the network on which the call is received, and dynamically convert data between the associated calls, and the dynamic conversion of data enables two people to engage in a live conversation even though one person is on the Internet and the other is on a COST network.

Cancel claim 3.

4. (Amended) The bridge unit of claim [3] 1 wherein the specific data from the incoming call is coded in a portion of an IP address associated with the incoming call.

7. (Amended) A method for converting telephony calls between Connection Oriented/Switched Telephony (COST) calls and Internet Protocol Telephony Network

(IPNT) calls, comprising steps of:

(a) connecting a COST trunk line to a trunk-line port and associated circuitry for receiving and placing Dedicated Connection Telephony (COST) telephone calls on a COST network, the trunk line port and associated circuitry in a computerized telephony bridge unit;

(b) connecting an Internet line to a data network port and associated circuitry for receiving and placing IPNT calls on the Internet, the data network port and associated circuitry also in the computerized telephony bridge unit;

(c) receiving a first call from one of the COST network and the Internet;

(d) extracting specific data from the incoming call on one network, either COST or IPNT;

using the extracted data to access a digitally-stored lookup table and to retrieve from the table a COST telephone number or an IP address on the network other than the network upon which the incoming call was received;

[(d)] (e) placing a second call associated with the first call on the network other than the network on which the first call is received using the retrieved telephone number or IP address; and

[(e)] (f) dynamically converting data between the two associated calls, thereby providing a continuing and dynamic telephony connection, enabling live conversation between a user on a COST telephone connected to the COST network and a user on an IPNT terminal connected to the Internet.

Cancel claim 9.

13. (Amended) A computerized telephony bridge unit, comprising:

a first port and associated circuitry for receiving and placing calls on a connection-oriented/switched telephony (COST) network, including circuitry for generating data according to a protocol compatible with the COST network;

a second port and associated circuitry for receiving and placing calls on an Internet network in which internet Protocol Network Telephony (IPNT) calls may be processed, including circuitry for generating data according to a protocol compatible

with the Internet; [and]

conversion circuitry for converting data dynamically between the COST network protocol and the Internet protocol[;] and

a digitally-stored look-up table relating COST telephone numbers to IP addresses;

[wherein] characterized in that control routines functioning as part of the bridge unit receive a first incoming call from either the COST network or the Internet, extract specific data encoded into the incoming call, either COST or IPNT, and use the extracted data to access the look-up table to determine an associated COST telephone number or IP address, and use the associated COST telephone number or IP address to place a call associated with the received call on the network other than the network on which the call is received, and dynamically convert data between the associated calls, and the dynamic conversion of data enables two people to engage in a live conversation even though one person is on the Internet and the other is on a COST network.

18. (Amended) A computerized telephony bridge unit, comprising:

a first port and associated circuitry for receiving and placing calls on an Internet network protocol or non-Internet network protocol, including circuitry for generating data according to protocols compatible with an Internet network or non-Internet network;

a second port and associated circuitry for receiving and placing calls on an Internet network protocol or non-Internet network protocol, including circuitry for generating data according to protocols compatible with an Internet network or non-Internet network; [and]

a digitally-stored look-up table relating COST telephone numbers to IP addresses;

and


conversion circuitry for converting data dynamically between ones of like networks protocols of the first and second ports;

[wherein] characterized in that control routines functioning as part of the bridge

unit receive a first incoming call from either the Internet or non-Internet protocol network, extract specific data encoded into the incoming call, either COST or IPNT, and use the extracted data to access the look-up table to determine an associated COST telephone number or IP address, and use the associated COST telephone number or IP address to place a call associated with the received call on the same network protocol on which the call is received, and dynamically convert data between the associated calls, and the dynamic conversion of data enables two people to engage in a live conversation even though each person is on the same call network protocol having dissimilar data protocols.

Respectfully,
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by


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